

Patrick J. Monaghan, Jr., Esq. (PJM6297)  
**Beattie Padovano, LLC**  
Attorneys for Defendants David Francescani,  
Victor Simone, Jr. and Dennis Suskind  
50 Chestnut Ridge Road, Suite 208  
Montvale, New Jersey 07645  
Phone: (201) 573-1810

Avi Israeli, Esq. (AI3259)  
(PHV Pending)  
**Holwell Shuster & Goldberg LLP**  
750 Seventh Avenue, 26th Floor  
New York, NY 10019  
Tel: (646) 837-5157

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ROBERT DE VITO, *individually and on  
behalf of all others similarly situated,*

Plaintiff,

Civil Action No. 2:15-cv-06969-KM-JBC

v.

LIQUID HOLDINGS GROUP, INC.;  
BRIAN M. STORMS; KENNETH D.  
SHIFRIN; PETER R. KENT; RICHARD  
SCHAEFFER; BRIAN FERDINAND; JAY  
BERNSTEIN; DARREN DAVY; DAVID  
FRANCESCANI; WALTER RAQUET;  
THOMAS ROSS; VICTOR SIMONE, JR.;  
DENNIS SUSKIND; ALLAN ZAVARRO;  
and SANDLER, O'NEILL & PARTNERS,  
L.P.

Defendants.

*Electronically Filed*  
**DECLARATION IN SUPPORT  
OF APPLICATION FOR  
ADMISSION  
PRO HAC VICE**

**DECLARATION OF AVI ISRAELI IN SUPPORT  
OF APPLICATION FOR ADMISSION PRO HAC VICE**

AVI ISRAELI hereby declares under penalty of perjury:

1. I am an attorney and partner in the Firm of Holwell Shuster & Goldberg LLP which has its offices at 750 Seventh Avenue, New York, New York 10019.

2. I was admitted to the New York Bar in 2005 and am presently in good standing with no disciplinary proceedings pending against me.

3. I am also admitted to practice before the United States District Court for the Southern District of New York, having been admitted in 2010 and there are no disciplinary proceedings pending against me.

4. I make this Declaration in support of my application to appear *pro hac vice* in this matter on behalf of defendants David Francescani, Victor Simone, Jr. and Dennis Suskind. I anticipate that there will be additional defendants represented by me and our local counsel Patrick J. Monaghan, Jr., Esq., of Beattie Padovano LLC.

5. I have read and am familiar with the Rules of the New Jersey District Court and agree to be bound by those Rules in all respects.

6. I am associated in this matter with Patrick J. Monaghan, Jr., counsel to Beattie Padovano LLC who is the attorney of record for defendants David Francescani, Victor Simone, Jr. and Dennis Suskind, is authorized to practice law in New Jersey and New York, and is a member in good standing of the bar of this Court.

7. Upon being admitted to appear and participate in this matter, *pro hac vice*, I shall promptly make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a), for any year in which I continue to appear in this matter.

8. Upon being admitted to appear and participate in this matter, *pro hac vice*, I shall also promptly make payment to the Clerk of the United States District Court for the District of New Jersey as provide by Local Civil Rule 10.1(c)(3).


9. Pursuant to Local Rule 101.1(c)(4), I understand that upon admission, *pro hac vice*, I am deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended.

10. I also understand that upon admission, *pro hac vice*, I am subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the New Jersey State Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to notify the Court immediately of the institution of any disciplinary proceedings against me or any matter affecting my standing at the bar of any other Court.

11. For the foregoing reasons, it is respectfully requested that the Court grant this application to have me admitted *pro hac vice* to appear and participate as counsel in this matter pursuant to Local Civil Rule 101.1(c).

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

EXECUTED this 28 day of March, 2016, at New York, New York.

  
AVI ISRAELI